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December 4, 2019

**BY ECF**

Hon. Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

## MEMORANDUM ENDORSED

Re: Martinez Aguilar et al v. VBFS Inc. et al  
19-cv-00621-GHW

Dear Judge Woods:

This firm represents Plaintiffs Lorena Martinez Aguilar, Manuel Carranza Cayetano, Fidadelfo Baldemar Rojas Lopez, Luis Alberto Romano Pareja, and Florindo Flores-Ramales in the above-referenced action. I respectfully request, jointly with Defendants, an extension of the deadline to file the joint pretrial order and additional pretrial materials, from December 6, 2019 to December 11, 2019.

This is the first request for an extension of time to submit the pretrial materials. The reason for the request is that although the parties have begun to exchange the pretrial materials, we anticipate needing additional time to attempt to resolve any disagreements and submit joint pretrial materials. We do not anticipate that the extension will necessitate any other extensions or adjournments of any other dates. We note that trial in the action is scheduled for February 18, 2020 and the final pretrial conference is scheduled for February 3, 2020.

We thank the Court for its attention to this matter.

Respectfully submitted,

MICHAEL FAILLACE & ASSOCIATES, P.C.

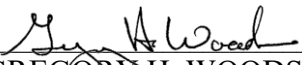
By: /s/ Joshua S. Androphy  
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cc: Nils Shillito (by ECF)

Application granted. The pre-trial materials described in the Court's June 5, 2019 order setting trial are due no later than December 11, 2019.

SO ORDERED.

Dated: December 5, 2019  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge